

STATE OF MICHIGAN

SUPREME COURT

ANGLERS OF THE AU SABLE, INC., a Michigan nonprofit corporation; MAYER FAMILY INVESTMENTS, LLC, a Michigan limited liability company; and NANCY A. FORCIER TRUST,

Plaintiffs-Appellants,

v

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY, a department in the Michigan Executive Branch, and STEVEN E. CHESTER, Director of the Michigan Department of Environmental Quality; and MERIT ENERGY COMPANY, a Delaware Corporation,
Defendants-Appellees.

S Ct Docket N^o: 138863, 138864, 138865, 138866

COA Docket No. 279301, 279306, 280265, 280266
(Consolidated)

L.C. Case N^o: 06-11697-CE(M)
Hon. Dennis F. Murphy

James M. Olson (P18485)
Scott W. Howard (P52028)
Jeffrey L. Jocks (P67468)
OLSON, BZDOK & HOWARD, P.C.
Attorneys for Anglers of the AuSable
420 East Front Street
Traverse City, MI 49686
Telephone: (231) 946-0044

Thomas A. Baird (P29050)
Co-Counsel for Anglers of the AuSable
11618 Jarvis Highway
Dimondale, MI 48821
Telephone: (517) 337-5599

Susan Hlywa Topp (P46230)
TOPP LAW OFFICE
Attorneys for Mayer Family Investments & Nancy A Forcier Trust
P. O. Box 1977
Gaylord, MI 49734
Telephone: (989) 731-4014

S. Peter Manning (P45719)
Neil D. Gordon (P56374)
Darryl J. Paquette (P73604)
Environmental, Natural Resources & Agriculture Div., Dept. of Attorney General
Attorneys for DEQ/Chester
P. O. Box 30755
Lansing, MI 48909
Telephone: (517) 373-7540

Charles E. Barbieri (P31793)
Zachary W. Behler (P70026)
FOSTER SWIFT COLLINS & SMITH, P.C.
Attorneys for Merit Energy Co.
313 S. Washington Square
Lansing, MI 48933
Telephone: (517) 371-8155

**APPELLANTS' REPLY BRIEF TO APPELLEE
MERIT ENERGY'S BRIEF ON APPEAL**

ORAL ARGUMENT REQUESTED

SEP 28 2010
SEP 28 2010
CLERK OF THE SUPREME COURT

September 27, 2010

TABLE OF CONTENTS

TABLE OF AUTHORITIES	ii
INTRODUCTION	1
1. Statement Concerning Merit’s Counter Statement Facts	1
2. MDNRE Could Not Convey Merit the Right to Discharge	2
3. The Reasonable Use Balancing Test is Not the Reasonable Use Doctrine	5
a. The Tests are Not the Same	6
b. The Specific Rules	7
4. This Court Should Overrule <i>MCWC v Nestlé</i>	8
Conclusion and Relief	9

TABLE OF AUTHORITIES

CASES:

<i>Beach v Hayner</i> , 207 Mich 93; 173 NW 487 (1919)	5
<i>Dumont v Kellogg</i> , 29 Mich 420 (1874)	2, 3
<i>Gehlen Bros v Kohler</i> , 101 Iowa 700; 70 NW 757 (1897)	7
<i>Kernan v Homestead Dev Co</i> , 232 Mich App 503; 591 NW2d 369 (1999)	8
<i>Lansing Schools Ed Assoc v Lansing Brd of Ed</i> , __Mich__; __NW2d__ (2010)	8
<i>Little v Kin</i> , 249 Mich App 502; 644 NW2d 375 (2002), <i>aff'd</i> , 468 Mich 699; 644 NW2d 749 (2003)	4
<i>MCWC v Nestlé</i> , 269 Mich App 25; 709 NW2d 174 (2005)	3, 6, 8
<i>People v Hulbert</i> , 131 Mich 156; 91 NW 211 (1902)	2, 7
<i>Ray v Mason Co Drain Comm'r</i> , 393 Mich 294; 224 NW2d 883 (1975)	9
<i>Thies v Howland</i> , 424 Mich 282; 380 NW2d 463 (1985)	4
<i>Thompson v Enz</i> , 379 Mich 667; 154 NW2d 473 (1967)	3, 4
<i>Wayne County Health Dep't v Olsonite</i> , 79 Mich App 668; 263 NW2d 778 (1977)	9

STATUTES:

MCL 324.1701, <i>et seq</i>	9
-----------------------------------	---

INTRODUCTION

Without precedent for the dramatic effect of such change, both Merit and the COA in *MCWC* and the instant appeal, would conclude that the rights of riparian owners and the quality of our most precious resource must be sacrificed in the name of an effusive notion of balancing harms with social and economic benefits. Not only is this result not the law, it is an absurd proposition for water law and public policy. The COA in *MCWC*, and the instant case, removed fundamental property law limitations on the use of riparian water law to benefit non-riparians or those out of a watershed. These watershed and non-riparian limitations are essential to Michigan's economy and quality of life.¹

1. Statement Concerning Merit's Counter Statement Facts

Merit's Counter Statement of Facts creates the misperception that Merit and MDNRE² carefully considered their proposed discharge into Kolke Creek and determined that it was a "logical and prudent" option. In fact, Defendants made little consideration and the Trial Court and COA found Merit and MDNRE's experts unreliable and wrong.³

Merit also tries to argue its costs concerning remediation of its contamination. However, Merit constructed the pipeline prior litigation of this matter with full knowledge that it acted at its own risk.⁴ In addition, Merit complains about costs to get new permits and create the new discharge

¹The Court can take judicial notice of the Great Lakes Basin Map boundaries at <http://www.fws.gov/midwest/greatlakes/map.htm>. A copy of the map printed from the hyperlink is attached as **Ex 1** for the Court's convenience. Very little of Ohio and Illinois are within the Great Lakes Basin, so it is to these states' advantage to adopt flexible water law tests like the Restatement of Torts, Sec. 857, 858. With Michigan, the situation is just the opposite. Surrounded by Great Lakes, it is in Michigan's interest to maintain common law riparian limits to protect watersheds from open-ended abuses or diversion by other states or interests.

²During trial, the MDNRE was still the MDEQ.

³**Appellants' Appx 9A-11A**, Trial Court Op pp 5-7; **Appellants' Appx 40A-61A**, COA Opinion.

⁴Trial Transcript, 2-28-2007, pp 232-35; Trial Exhibit 30.

system. Since the beginning of this case, Merit has been on notice that it could utilize the on-site treatment and discharge system it now uses. Merit chose to stonewall and deny onsite discharge or infiltration until recently, when Merit sought to undermine this Court's granting of leave to appeal by caving in and claiming the case is moot.⁵ Oddly, Merit again claims that this case is moot when this Court has already decided the issue. In any event, the questions embodied in this appeal extend far beyond Merit's factual admission that it does not need to discharge to Kolke Creek.⁶

Merit also makes unsupported claims that Appellants' statements of the law would make large municipal discharges illegal. Michigan law authorizes public sewers and drains, with respective procedures for condemnation. In addition municipal discharges with little measurable effect (*de minimus*) are usually not questioned or prohibited by injunction. *People v Hulbert*, 131 Mich 156, 161; 91 NW 211 (1902). In any event, municipalities have no right to control a stream or lake more than any other riparian; should it attempt to do so, the municipality is subject to injunction or eminent domain.⁷ *Id.*, at 173-174.

2. MDNRE Could Not Convey Merit the Right to Discharge

Merit claims that Michigan riparian law allows MDNRE to grant Merit an easement to discharge its wastewater into Kolke Creek. To do so, Merit relies on general statements of reasonable use law from *Dumont v Kellogg*, 29 Mich 420, 425 (1874), and *People v Hulbert*, 131 Mich 156, 161; 91 N 211 (1902). However, those are statements of riparian law rules for *disputes between riparian proprietors* for use of the water on, or in connection with, their own riparian

⁵ See e.g., **Appellants' Appx 62A-85A**; Plaintiffs' Supplemental Trial Brief (Docket Date 2-20-2007), pp 4-5.

⁶ Merit claims that when Appellants sought to add the water withdrawal permits to the record, Appellants believed those permits should not have been granted. That is not correct. Appellants sought inclusion of those permits only to demonstrate that the MDNRE is using the improper Reasonable Use Balancing Test from the *MCWC* case in permit analyses involving riparian waters.

⁷ **Appellants' Appx 20A-21A.**

property. *Id.* In *Dumont* for example, this Court offered multiple citations all of which concerned “proprietors on the same stream” and consistently used the term “riparian proprietor.” *Id.* Moreover, Merit has simply ignored this Court’s holdings on the limitation on conveyances of riparian rights by easement.⁸

In *Thompson v Enz*, this Court distinguished natural uses (uses like drinking and irrigation) from artificial uses (uses to increase comfort and prosperity like commercial profit and recreation) and stated that use for an “artificial purpose must be (a) only for the benefit of the riparian land and (b) reasonable in light of the correlative rights of the other proprietors.” 379 Mich 667, 686-687, 154 NW2d 473 (1967). *MCWC v Nestlé*, 269 Mich App 25; 709 NW2d 174 (2005) (which Merit places significant reliance upon) acknowledged these limitations on transfer or diversions of water or conveyance of riparian rights to non riparian or out of watershed users.

[D]iversions of water from a lake or stream that do not benefit riparian lands were generally considered unreasonable per se. (fn 34)
In addition, natural water uses are preferred over artificial uses.⁹

However, as detailed in Appellants’ Brief on Appeal, the *MCWC* Court felt that these long standing principles and rules should be discarded in favor of a “modern” interpretation.

FN 49. While we acknowledge that, at least in the context of riparian rights, prior courts have determined that uses that did not benefit the riparian land were unreasonable per se, see n34 of this opinion, we believe that such a per se rule is incompatible with modern use of the balancing test. Instead, we hold that the location of the use is but one of the factors that should be considered in balancing the relative interests.¹⁰

⁸Merit also misinterprets *People v Hulbert* by arguing its prevention of the downstream riparian-city- from prohibiting an upstream riparian - swimmer - -from swimming applies to this case. 131 Mich 15; 91 NW211 (1902). In *Hulbert*, this Court held that the city could not extinguish upstream riparian rights without just compensation. *Id.* at 158. Here, Appellants are not trying to extinguish the State’s riparian rights, only attempting to protect their own riparian rights from a discharge from off-tract and out of watershed that would contaminate and increase the flow of Kolke Creek by 2000%. The discharge is a use that is not within the State’s riparian rights.

⁹*MCWC*, *supra* at 57-58 & n34: FN34.

¹⁰*MCWC*, *supra* at 72 & n49.

Merit's claim that "Michigan's riparian law, in short, stands for the exact opposite proposition that Plaintiffs' assert" is wrong. Merit simply agrees with the *MCWC* Court to the extent that it prefers the *MCWC* Court's modification of riparian law. However, Merit refuses to accept that prior to *MCWC* and this instant appeal, this Court established general limitations on conveyances and easements that purported to transfer riparian rights to non riparian land or users.

Merit attempts to discredit the prohibition in *Thompson* by claiming that *Thompson* allows for easements for all riparian rights. On the contrary, *Thompson* recognized only the right to grant a surface access easement to properties created from an original riparian parcel. *Id.* at 686, 694 ("While riparian rights may not be conveyed or reserved...easements, licenses and the like *for a right of way* for access to a watercourse do exist and oftentimes are granted to nonriparian owners.")

Merit also quotes the Court of Appeals decision in *Little v Kin*, 249 Mich App 502; 644 NW2d 375 (2002), *aff'd*, 468 Mich 699; 644 NW2d 749 (2003), but editorializes, stating that *Little* "established [*without limitation*] the critical principle that rights normally afforded exclusively to riparian landowners may be conferred by easement."¹¹ The actual quote from *Little* reads: "Thus, while recognizing that riparian ownership rights may not be transferred apart from riparian land, the Supreme Court established the critical principle that rights normally afforded exclusively to riparian landowners may be conferred by easement." *Little*, *supra* at 511.

This quote is not "without limitation" and must be read in the context of the holding and facts. Like *Thompson*, *Little* concerns a *recreational access easement* for backlotters granted in a platted subdivision and the case *Little* relied on for the above quote is *Thies v Howland*, 424 Mich 282; 380 NW2d 463 (1985). *Little*, at 504, 511. *Thies* also concerned *recreational access* for backlotters in a platted subdivision. *Thies*, at 286. This is the very same principle as found in *Thompson*. All of the cases Merit relies on concern *recreational access easements* created when the owner of an originally large riparian lot divided it and reserved an easement for access to backlotters.

¹¹Merit Brief, p 9 (emphasis added by Appellants).

Finally, Merit quotes *Beach v Hayner*, 207 Mich 93, 96; 173 NW 487 (1919), to argue that Michigan law allows any person “to use watercourses as long as they ‘can obtain access to them without trespass, so far as they do not interfere with the reasonable use of the pond by others, or with the public rights, unless in cases where the legislature has otherwise directed.’”¹² Again, Merit’s editorializing omits the important facts that plaintiff owned the majority of the land surrounding the lake and the defendants owned a few lots. *Id.* at 93-94. Plaintiff objected to defendants allowing their renters to use the lake for boating. *Id.* This Court held that “where there are several riparian owners to an inland lake, such proprietors and their lessees and licensees may use the *surface of the whole lake for boating and fishing*, so far as they do not interfere with the reasonable use of the waters by other riparian owners.” *Id.* at 98 (emphasis added). Again, this affirms that Michigan law allows for licenses and easements for access over the riparian parcel for recreation. Michigan law does not authorize broad easements for artificial uses of riparian water that do not originate with or benefit the riparian land.

3. The Reasonable Use Balancing Test is Not the Reasonable Use Doctrine

Merit makes a circular argument to conclude that the Reasonable Use Balancing Test (“RUBT”) is “one and the same” as the Reasonable Use doctrine under Michigan law. It does so by citing the *MCWC* Court’s statements that it relied on *Dumont* and that it adopted the “reasonable use balancing test first stated in *Dumont*....”¹³

Merit’s argument that the reasonable use doctrine is the same as RUBT misses the mark for two reasons. First, it ignores that the ultimate test and factors set out in *MCWC* as the RUBT differs from the reasonable use doctrine under all previous Michigan law. That is, the analysis is different. Second, Merit again ignores the specific per se rules set out and affirmed in riparian law cases leading up to *MCWC* which *MCWC* decided should no longer be part of the law.

¹²Merit Brief, p 9 quoting *Beach*, *supra* at 96.

¹³Merit Brief, p 10-11 quoting *MCWC*, *supra* at 67.

a. The Tests are Not the Same

The *MCWC* Court stated the factors for the RUBT are to be balanced by weighing the would-be user's side against the riparian owners side. *MCWC, supra* at 55. This new "balancing" and the idea that "the reasonable use doctrine generally allows water to be transported and used on nonriparian lands..." finds no support in Michigan law.¹⁴ Although the *MCWC* Court's citation to support their new law appears to point to Michigan law, the quote actually comes from the *Stoebuck & Whitman* book.¹⁵ The *MCWC* Court's basic rationale for its new RUBT finds no support in Michigan law.

The *MCWC* Court states that the RUBT factors are "(1) the purpose of the use, (2) the suitability of the use to the location, (3) the extent and amount of the harm, (4) the benefits of the use, (5) the necessity of the amount and manner of the water use, and (6) any other factor that may bear on the reasonableness of the use." *MCWC, supra* at 71. Although the factors, as listed, seem similar to the reasonable use doctrine, when the *MCWC* Court analyzed them, it changed the factors. *Id.* at 71-78. Most significantly it said that

In assessing the harm and benefits, the court should examine not only the economic harm and benefits to the parties, but should also examine the social benefits and costs of the use, such as its effect on fishing, navigation, and conservation. *Thompson, supra* at 689. Negative social effects should weigh against the use, *see* Restatement, § 850A, comment f, p 226, and positive social effects should weigh in favor of a determination of reasonableness, *Hart, supra* at 323, 151 NW2d 826 (noting that the sewer line benefitted the area).

MCWC, supra at 73. The *MCWC* Court went on to use this balancing to weigh the employment and tax benefits of Defendants' operation against the harm to the individual riparians in the case and conclude: "Overall, under the facts of this case, the harms inflicted on the riparian plaintiffs and the community in general are *significantly* offset by the economic benefits to society and the local community. Hence, this factor does not favor any party." *MCWC, supra* at 74-77 (emphasis added).

¹⁴Appellants' Brief on Appeal, p 21-22.

¹⁵Appellants' Brief on Appeal, p 21-22.

Thus, the *MCWC* Court completely erased the harms caused by finding social and economic benefits outweighed them.

Thompson did not mention “social benefits”, but instead said “it is necessary to examine the proposed artificial use in relation to the consequential effects, including the benefits obtained and the detriment suffered, on the correlative rights and interests of other riparian proprietors and also on the interests of the State, including fishing, navigation, and conservation.” *Thompson, supra* at 689. In fact, the very next sentence in *Thompson* contradicts the *MCWC* balancing of social benefits: “An additional fact to be considered by the trial court in this litigation is whether the benefit to the defendant subdividers would amount merely to a rich financial harvest, while the remaining proprietors—who now possess a tranquil retreat from everyday living—would be forced to endure the annoyances which would come from an enormous increase in lake users.” *Id.* Surely the development in *Thompson* would have social and economic benefits by increasing the tax base for property with access to Gun Lake, by creating construction jobs, and by increasing the area population that would frequent commercial establishments, but this Court did not consider that a “benefit” that would outweigh the harms to other riparians. *Id.*

The *MCWC* Court’s RUBT factors and balancing test are not the same as the reasonableness doctrine. This Court has limited the factors to determine reasonableness between adjacent owners to physical consequences, such as extent, nature, suitability, and interference of the use with other uses, and whether the use is artificial or natural. *People v Hulbert, supra*, at 169-170, quoting *Gehlen Bros v Kohler*, 101 Iowa 700, 705; 70 NW 757 (1897); *Thompson, supra* at 688. The RUBT and the reasonable use doctrine are not “one and the same.” It is not the law of groundwater, riparian, or groundwater/riparian disputes and should not have been used in *MCWC* or in this case.

b. The Specific Rules

Michigan riparian law has always recognized specific rules concerning material diminishments caused by off tract or out of watershed uses and uses that do not benefit the riparian

land.¹⁶ The Court of Appeals has done so too. “However, even if riparian rules apply, defendant cannot pollute the water or unreasonably increase the flow to the extent that it floods plaintiffs’ property.” *Kernan v Homestead Dev Co*, 232 Mich App 503, 511-12; 591 NW2d 369 (1999). Even the *MCWC* Court recognized them: “While we acknowledge that, at least in the context of riparian rights, prior courts have determined that uses that did not benefit the riparian land were unreasonable per se, *see* n34 of this opinion, we believe that such a per se rule is incompatible with modern use of the balancing test.” *MCWC*, *supra* at 57-58, 72, n34 & n49. The *MCWC* Court expressly disregarded the law of this Court and of this State to make its new “balancing test” compatible. Again, the RUBT and the reasonable use doctrine are not “one and the same.”

4. This Court Should Overrule *MCWC v Nestlé*

Merit is correct that *Lansing Schools Ed Assoc v Lansing Brd of Ed*, ___Mich___; ___NW2d___ (2010), overruled *MCWC v Nestlé*, 479 Mich 280 (2007). For the reasons set forth in Appellants’ Brief on Appeal and Reply Briefs, along with the brief of amici Michigan Environmental Action Council and National Wildlife Federation, this Court should simply affirm that *MCWC v Nestlé*’s standing rule was overruled in *Lansing Schools*. Accordingly, Merits’ arguments about reversing the actual case in *MCWC* are inapplicable.

Merit also argues, preposterously, that federal, state, and local law adequately address water use, so riparian rights and property law can be disregarded. Or, Merit argues, absurdly, that Article 4, Section 52, Michigan Constitution of 1963 (which has to do with regulations under the police power), prevents common law claims by riparians to stop unreasonable or unlawful water uses or diversions. This would completely wipe-out private property and water law.

Merit also argues that the *MCWC* Court’s RUBT is “exactly the procedure that is expounded by the Michigan Environmental Protection Act (“MEPA”)....” That is simply not true. MEPA prohibits *all* likely pollution, impairment or destruction to water (and all other natural resources)

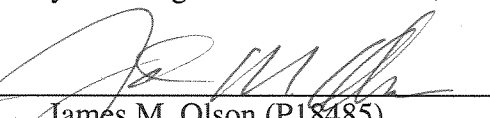
¹⁶*See* Appellants’ Brief on Appeal, pp 9-30.

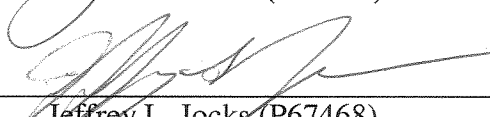
unless the defendant can show no other feasible and prudent alternatives, regardless of cost. MCL 324.1701, *et seq*; *Ray v Mason Co Drain Comm'r*, 393 Mich 294; 224 NW2d 883 (1975); *Wayne County Health Dep't v Olsonite*, 79 Mich App 668, 701-04; 263 NW2d 778 (1977). The RUBT would allow any harm to water to be balanced or outweighed by social and economic benefits. No such language and no such defense exist in the plain language of the MEPA.

Conclusion and Relief

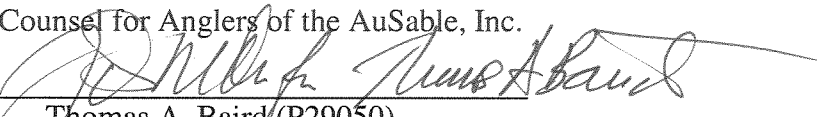
For the reasons set forth in **Appellants' Brief on Appeal**, dated July 19, 2010, and **Appellants' Reply Briefs**, Appellants Anglers of the Au Sable and the Mayer and Forcier families submit that the COA's *MCWC v Nestlé* "reasonable use balancing test," relied on by the trial court and COA in the instant appeal, should be overruled. Further, Appellants submit that the extension of *MCWC v Nestlé's* "reasonable use balancing test" in *Anglers of Au Sable v MDEQ* to all riparian lakes and streams in Michigan should be reversed and that MDNRE could not legally grant Merit an easement for its discharge. Appellants also restate all relief requested in their Brief on Appeal.

OLSON, BZDOK & HOWARD, P.C.
Attorneys for Anglers of the AuSable, Inc.

By: 
James M. Olson (P18485)

By: 
Jeffrey L. Jocks (P67468)
Date: September 27, 2010

Co-Counsel for Anglers of the AuSable, Inc.

By: 
Thomas A. Baird (P29050)
Date: September 27, 2010

TOPP LAW OFFICE
Attorneys for Mayer Family Investments &
Nancy A. Forcier Trust


By: 
Susan Hlywa Topp (P46230)
Date: September 27, 2010

Exhibit 1.

Great Lakes Basin Map

Great Lakes Basin ECOSYSTEM TEAM

Locations and Map

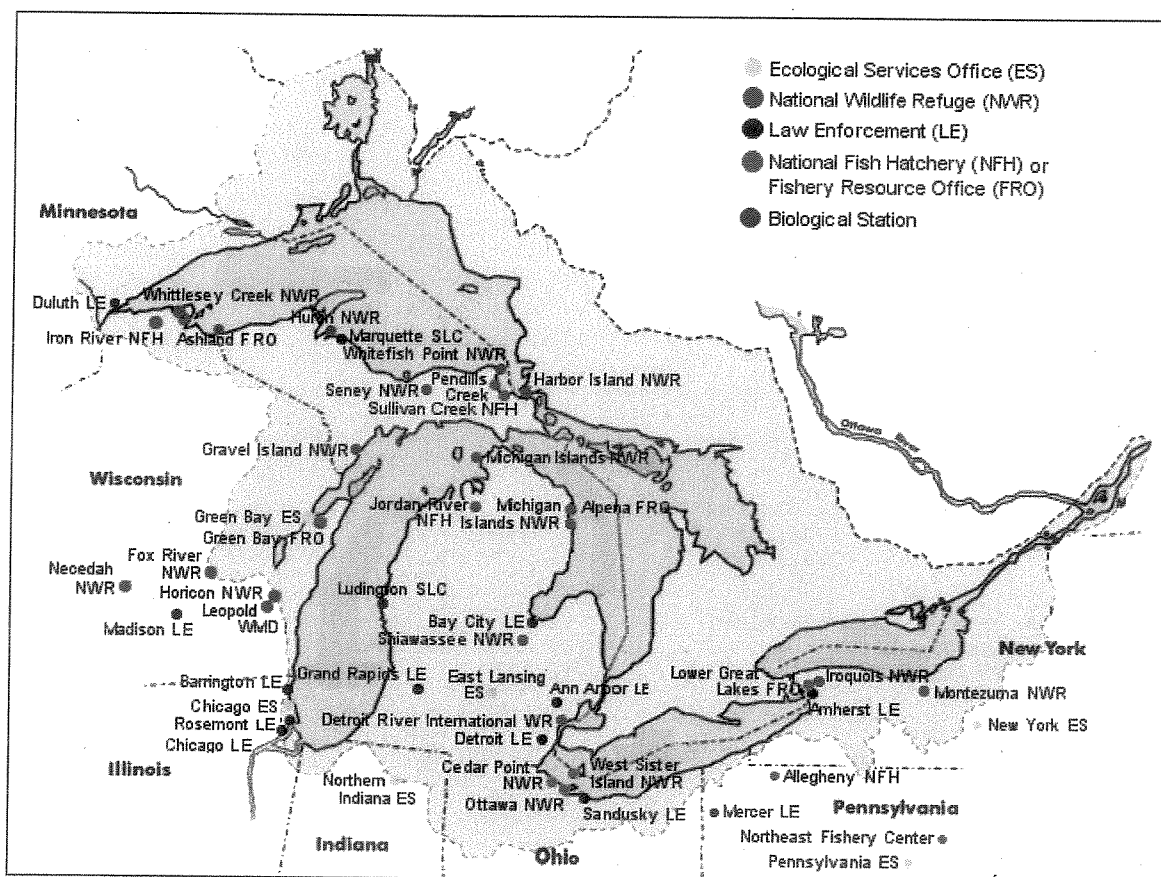


Invasive Species	GIS-Decision Support	Great Lakes Islands	Lake Sturgeon	Migratory Birds	Endangered Species	Education/ Outreach	Coastal Habitat Restoration	Locations/ Map
------------------	----------------------	---------------------	---------------	-----------------	--------------------	---------------------	-----------------------------	----------------

Home | Search | Great Lakes Coastal Program | The Great Lakes Basin Ecosystem | Great Lakes Links
Map/Location | Executive Committee | Meetings | Accomplishments | 2005 Plans | Fact Sheets | Send Feedback

Click on a specific office or location on the map to go directly to that unit's Web pages.

Text links listed alphabetically by state can be found [lower on this page](#).



Illinois

Ecological Services Office
Chicago Ecological Services Field Office

Law Enforcement Offices
Rosemont Law Enforcement Office
Chicago Law Enforcement Office
Barrington Law Enforcement Office

Indiana

Ecological Services Office
Northern Indiana Ecological Services Sub-field Office

Michigan

Wildlife Refuges

Detroit River International Wildlife Refuge
Gravel Island National Wildlife Refuge
Harbor Island National Wildlife Refuge
Huron National Wildlife Refuge
Michigan Islands National Wildlife Refuge
Seney National Wildlife Refuge
Shiawassee National Wildlife Refuge
Whitefish Point National Wildlife Refuge

Ecological Services Offices

East Lansing Ecological Services Field Office

Fishery Resources

Alpena Fishery Resources Office
Jordan River National Fish Hatchery
Sullivan Creek/Pendills Creek National Fish Hatchery
Complex

Law Enforcement Offices

Ann Arbor Law Enforcement Office
Bay City Law Enforcement Office
Detroit Law Enforcement Office
Grand Rapids Law Enforcement Office

Coordination Office

Great Lakes Coordination Office

Biological Stations

Marquette Biological Station
Ludington Biological Station

Partners

Michigan Partners for Wildlife Office

Minnesota**Ecological Services Office**

Twin Cities Ecological Services Field Office

Law Enforcement Offices

Duluth Law Enforcement Office
St. Paul Law Enforcement Office

Partners

Minnesota Partners for Wildlife Office

New York**Wildlife Refuges**

Iroquois National Wildlife Refuge
Montezuma National Wildlife Refuge

Ecological Services Office

New York Ecological Services Field Office

Fishery Resources

Lower Great Lakes Fishery Resources Office

Law Enforcement Office

Amherst Law Enforcement Office

Ohio**Wildlife Refuges**

Cedar Point National Wildlife Refuge
Ottawa National Wildlife Refuge
West Sister Island National Wildlife Refuge

Ecological Services Office

Reynoldsburg Ecological Services Field Office

Law Enforcement Office

Sandusky Law Enforcement Office

Pennsylvania

Ecological Services Office